

EXHIBIT A



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MINHYE PARK,

Index No.: 1:20-cv-02636

Plaintiff,

-against-

**SECOND NOTICE OF
PLAINTIFF'S DEPOSITION**

DAVID DENNIS KIM, M.D.,

Defendant.

-----X

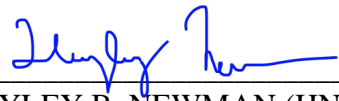
PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, the defendant DAVID DENNIS KIM, M.D., by and through his attorneys, HEIDELL, PITTONI, MURPHY & BACH, L.L.P., will take the deposition upon oral examination of MINHYE PARK on the **20th day of September 2021 at 10:00 a.m.** EST and will continue consistent with Rule 30(d) until it is completed. The deposition will take place via videoconferencing and to be recorded via stenographic means with Deitz Lexitas Reporters, before a Notary Public of the State of New York or other person duly qualified to administer oaths under the Federal Rules of Civil Procedure. A court certified Korean interpreter will be retained for the deposition. A link to the deposition will be sent via email the day prior to the deposition.

Said party is to be examined on all claims, allegations, alleged damages and evidence material and necessary in the defense of this action.

Dated: New York, New York
August 12, 2021

Respectfully submitted,

HEIDELL, PITTONI, MURPHY & BACH, LLP

By: 
HAYLEY B. NEWMAN (HN 5509)
99 Park Avenue, 7th Floor
New York, New York 10016
Tel.: (212) 286-8585
hnewman@hpmb.com

Attorneys for Defendant
DAVID DENNIS KIM, M.D.

TO: **VIA EMAIL and FIRST-CLASS MAIL**

Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556
jae@lawjsl.com

From: Borelli, Anna Marie

Sent: Thursday, August 12, 2021 2:44 PM

To: 'jae@lawjsl.com' <jae@lawjsl.com>

Cc: Newman, Hayley B. <hnewman@hpmb.com>

Subject: Park v. Kim, et.al. - Index No.: 1:20-cv-02636 - Re: Second Notice of Plaintiff's Deposition - (Our File No.: 778-1018)

On behalf of Hayley Newman, attached please find a Second Notice of Plaintiff's Deposition, relative to the above-referenced matter. Thank you.

Anna Marie Borelli
Legal Secretary
Heidell, Pittoni, Murphy & Bach, LLP
99 Park Avenue
New York, NY 10016
Tel: (212) 286 - 8585
Fax: (212) 490 - 8966
www.hpmb.com



Borelli, Anna Marie

From: Scott, James
Sent: Thursday, August 12, 2021 3:21 PM
To: Borelli, Anna Marie; Print & Copy Request
Cc: Newman, Hayley B.
Subject: RE: Park v. Kim, et.al. - Index No.: 1:20-cv-02636 - Re: Second Notice of Plaintiff's Deposition - (Our File No.: 778-1018)

Completed

From: Borelli, Anna Marie <aborelli@hpmb.com>
Sent: Thursday, August 12, 2021 3:02 PM
To: Print & Copy Request <Print&Copy@hpmb.com>
Cc: Newman, Hayley B. <hnewman@hpmb.com>
Subject: FW: Park v. Kim, et.al. - Index No.: 1:20-cv-02636 - Re: Second Notice of Plaintiff's Deposition - (Our File No.: 778-1018)

Good Afternoon:

Can someone please mail a copy of the attached, **Via First-Class Mail**, to the following party:

Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556

I have attached your Affidavit of Service. Please print and sign and put on my chair/desk, and I will have it notarized when I come in next Wednesday.

Thank you.

Anna Marie Borelli
Legal Secretary
Heidell, Pittoni, Murphy & Bach, LLP
99 Park Avenue
New York, NY 10016
Tel: (212) 286 - 8585
Fax: (212) 490 - 8966
www.hpmb.com



AFFIDAVIT OF SERVICE
VIA FIRST CLASS MAIL

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Print Name Here James Scott being duly sworn, deposes and says:

Deponent is not a party to this action, is over 18 years of age, and is employed by CANON BUSINESS PROCESS SERVICES.

On **August 12, 2021**, deponent served the within **SECOND NOTICE OF PLAINTIFF'S DEPOSITION**, upon the following person(s):

VIA FIRST-CLASS MAIL

Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556
jae@lawjsl.com

at the address(es) designated by said person(s) for that purpose by delivering a true copy of same enclosed in a post-paid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service (USPS), within the State of New York, ***VIA FIRST CLASS MAIL..***



SIGNATURE

SWORN to before me this
24th day of August, 2021



NOTARY PUBLIC

Laura G. DeSanti
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 01DE6419682
Qualified in New York County
Commission Expires 07/12/2025

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ANNA MARIE BORELLI, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age and is employed by
HEIDELL, PITTONI, MURPHY & BACH, LLP.

On August 12, 2021, deponent served the within **SECOND NOTICE OF
PLAINTIFF'S DEPOSITION** upon the following attorneys at the e-mail addresses
designated by said attorneys for that purpose by delivering a true copy of same **VIA
ELECTRONIC MAIL.**

TO:

VIA EMAIL

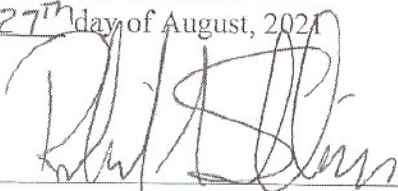
Jae Lee, Esq.
JSL LAW OFFICES, P.C.
Attorneys for Plaintiff
626 RXR Plaza
Uniondale, NY 11556
jae@lawjsl.com



ANNA MARIE BORELLI

SWORN to before me this

27th day of August, 2021



NOTARY PUBLIC

